

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

MICHAEL T. DREHER,

Plaintiff,

v.

Civil Action No. 3:11cv624 (JAG)

EXPERIAN INFORMATION SOLUTIONS, INC.,

Defendants.

**PLAINTIFF'S MEMORANDUM IN SUPPORT OF HIS CONSENT MOTION FOR
EXTENSION OF TIME TO FILE RESPOND TO DEFENDANT'S OPPOSITION TO HIS
MOTION FOR ATTORNEYS' FEES AS IT RELATES TO INDIVIDUAL CLAIMS**

COMES NOW the Plaintiff, Michael T. Dreher, ("Plaintiff"), by counsel and with the consent of the Defendant Experian Information Solution Inc.'s ("Experian"), pursuant to Fed. R. Civ. P. 6(b) and Local Rule 7(I), and respectfully moves for an extension of time of 12 days to file his response to Defendant's Opposition to his Motion for Attorneys' Fees as it Relates to Individual Claims. On March 11, 2016, the Defendant filed its Opposition to Plaintiff's Motion for Attorneys' Fees as it Relates to Individual Claims. (Doc. 432). The time for the Plaintiff to file a motion for attorneys' fees has not yet expired, therefore this motion is timely.

Plaintiff's counsel requests the extension so they can properly address the issues that Defendant has raised while still meeting familial spring break obligations. A brief extension of time of twelve days will provide the necessary time to Plaintiff to adequately address the arguments raised by Defendant. Neither party will be legally prejudiced by an extension of time. This motion is made in good faith and not for a dilatory purpose. For these reasons, the Plaintiff respectfully requests entry of an order allowing an additional 12 days, until March 29, 2016, to

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of March, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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